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UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK

CHARLES DODGSON, et ux., ELIZABETH J. : 07 CV 6311 (GBD) DODGSON, and ROSEANNA M. ROBINSON, :

Plaintiffs,

-against-

: STIPULATION AND ORDER

GUIDANT COPORATION, GUIDANT SALES CORPORATION, CARDIAC PACEMAKERS, INC., and BOSTON SCIENTIFIC CORPORATION,

Defendants.

IT IS HEREBY STIPULATED by and between Defendants Guidant Corporation, Guidant Sales Corporation, Cardiac Pacemakers, Inc. and Boston Scientific Corporation (collectively, "Defendants") and Plaintiffs through their designated counsel, that the time for Defendants to answer or otherwise respond to the Complaint in this action and for the parties to participate in pretrial proceedings will be stayed and will be set by the MDL transferee district court in the District of Minnesota that is managing the multidistrict litigation entitled In Re Guidant Corp. Implantable Defibrillators Products Liability Litigation and bearing MDL Number 1708.

Dated: Binghamton, New York July 12, 2007

LAW OFFICES OF RONALD R. BENJAMIN

By: Maura C. Young Ronald R. Benjamin (RB 2055) Marya C. Young (MY 9452) Attorneys for Plaintiffs 126 Riverside Drive P.O. Box 607 Binghamton, New York 13902 (607) 772-1442

MEI 6574765v.1

Dated: New York, New York July 12, 2007 McCARTER & ENGLISH, LLP

By: Au Swydd Lori J. Shyavitz (LS 5065)

Lori J. Shyavitz (LS 5068 Attorneys for Defendants

Guidant Corporation, Guidant Sales

Corporation, Cardiac Pacemakers, Inc. and

Boston Scientific Corporation

245 Park Avenue

New York, New York 10167

(212) 609-6800

SO ORDERED:

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